



Muriel Goode-Trufant  
Corporation Counsel

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**DORIS F. BERNHARDT**  
Senior Counsel  
Affirmative Litigation Division  
Phone: 212-356-2296  
Fax: 212-356-2038  
email: dbernhar@law.nyc.gov

February 24, 2025

**VIA ECF**

Hon. Jennifer H. Rearden, U.S.D.J.  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: City of New York v. Trump et al., 25-cv-1510**

Dear Judge Rearden,

I represent plaintiff the City of New York ("City") in the above captioned matter. On Friday February 21, 2025, the City filed the complaint in this lawsuit and a motion for a preliminary injunction by order to show cause, with a temporary restraining order ("TRO") requested. I write pursuant to Rule 4 of the Court's Individual Rules of Practice in Civil Cases.

Under Rule 4, a party that files an application for a TRO must file a letter motion stating whether (i) The adversary has been notified, and whether the adversary consents to temporary injunctive relief; or (ii) The requirements of Federal Rule of Civil Procedure 65(b) are satisfied, and no notice is necessary.

Counsel for the City forwarded copies of all papers by electronic mail to attorneys for the U.S. Department of Justice on February 21, 2025 after completion of filing. We are in communication with counsel for defendants (cc'd here). The City has requested defendants' position on the TRO and the scheduling of a hearing on the motion, which the City seeks to schedule expeditiously.

We thank the Court for its consideration.

Respectfully submitted,

s/Doris Bernhardt

---

Doris F. Bernhardt  
Senior Counsel

cc: via electronic mail to Anthony Sun, Jeffrey Oestericher, Brandon Waterman (counsel for defendants)